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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH EDWARD GREENLAND,

Defendant.

Case No. 2:21-cr-160-APG-VCF

**Stipulation to Extend Deadlines  
Regarding Defendant's Motion (Second  
Request)**

It is hereby stipulated and agreed, by and between Christopher Chiou, Acting United States Attorney, through Jim W. Fang, Assistant United States Attorney, and Ronald Daniel Hedding, Esq., counsel for defendant, that the government's deadline to respond to defendant's Motion to Suppress Evidence, ECF No. 63, currently set for October 11, 2021, be extended until October 25, 2021.

1. Defendant filed his Motion to Suppress Evidence on September 3, 2021, and the parties agreed to extend the government's response deadline to October 11, 2021 due to government counsel's involvement in the preparation of trial of an unrelated matter, which the Court granted.

2. Since then, government counsel had begun to prepare and draft the response. However, in an effort to locate the officers involved in the arrest and seizure, which is

1 certainly important for both parties concerning the disposition of the motion, the  
2 government discovered that one of the officers, Officer Stalnaker, no longer works for the  
3 Las Vegas Metropolitan Police Department. The government has had a difficult time  
4 locating this particular officer.

5 3. To thoroughly prepare its response, the government reached out to defense  
6 counsel to discuss another two-week extension to the government's response deadline, so  
7 that it can locate this officer and file a thorough response. Defense counsel graciously  
8 consented to the extension.

9 4. As such, the government respectfully ask this Court to grant a two-week  
10 extension, or until October 25, 2021, for the government to respond to defendant's motion  
11 to suppress.

12 DATED this 8th day of October, 2021.

13 CHRISTOPHER CHIOU  
14 Acting United States Attorney

15 s/ Jim W. Fang  
JIM W. FANG  
Assistant United States Attorney  
16 Counsel for the United States

17 s/ Ronald Daniel Hedding  
RONALD DANIEL HEDDING, ESQ.  
18 Counsel for Defendant  
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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:21-cr-160-APG-VCF

4 Plaintiff,

5 v.

6 KENNETH EDWARD GREENLAND,

7 Defendant.

8 **ORDER**

9 Based on the pending Stipulation between the defense and the government, and good  
10 cause appearing therefore, IT IS HEREBY ORDERED that the Government's response to  
11 defendant's Motion to Suppress Evidence, ECF No. 63, shall be filed and served on or  
12 before October 25, 2021.

13 DATED this 12th day of October, 2021.

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16 HONORABLE CAM FERENBACH  
17 UNITED STATES MAGISTRATE JUDGE  
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